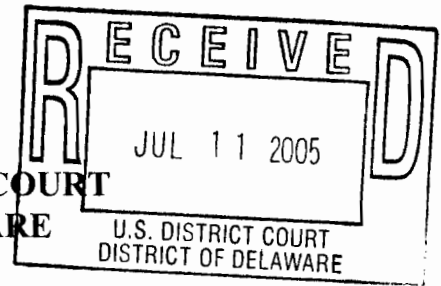


(Del. Rev 12/98)

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE



Gallant Blazer Inc.

JAMES R. JONES, President

TERENCE GADSON, BRUCEY DIXON, FRED COOPER, ANNE COLLINS
(Name of Plaintiff or Plaintiffs) COREY FERRELL

05 - 479

v.

CIVIL ACTION NO.

City of Wilmington Fire Department

(Name of Defendant or Defendants)

COMPLAINT

1. This action is brought pursuant to 42 U.S.C. 2000e-5
(Federal statute on which action is based)
for discrimination related to RACE, hiring, Promotion jurisdiction exists by virtue of
(In what area did discrimination occur? e.g. race, sex, religion)
42 USC 2000e-5 .0.
(Federal statute on which jurisdiction is based)

2. Plaintiff resides at 106 W 42nd Street
(Street Address)
Wilmington NEWCASTLE DELAWARE 19802
(City) (County) (State) (Zip Code)
302-762-0607
(Area Code) (Phone Number)

3. Defendant resides at, or its business is located at 300 N WALNUT ST
(Street Address)
Wilmington NEWCASTLE DELAWARE 19801
(City) (County) (State) (Zip Code)

4. The alleged discriminatory acts occurred on OVER PERIOD OF TIME
(Day) (Month) (Year)

5. The alleged discriminatory practice Q is Q is not continuing.

6. Plaintiff(s) filed charges with the EEOC
 (Agency)
21 S. Fifth St. Suite 400 Philadelphia, PA 19106-2515
 (Street Address) (City) (County) (State) (Zip)

regarding defendant(s) alleged discriminatory conduct on: _____
 (Date)

7. Attach decision of the agency which investigated the charges referred in paragraph 6 above.

8. Was an appeal taken from the agency's decision? Yes ☐ No ☒ Q

If yes, to whom was the appeal taken? _____

9. The discriminatory acts alleged in this suit concern: (Describe facts on additional sheets if necessary)

I Alleged that Wilmington's Black & Hispanic Firefighters
As A whole Are being discriminated Against in violation of Title
 VII of the Civil Rights Act. of 1964. I contend that Blacks &
Hispanics Are disciplined more severely than Whites for similar
work rule violations. Respondent's hiring & Promotional policies
and practices have a disparate impact upon Blacks & Hispanics.

10. Defendant's conduct is discriminatory with respect to the following:

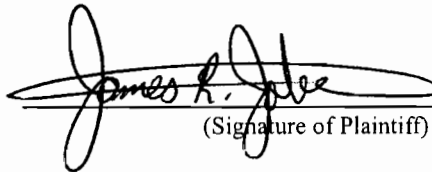
- ☒ A. Q Plaintiff's race
- ☒ B. Q Plaintiff's color
- C. Q Plaintiff's sex
- D. Q Plaintiff's religion
- E. Q Plaintiff's national origin

11. Plaintiff prays for the following relief: (Indicate the exact relief requested)

Will be determined at a later date. No
less than 5 million dollars.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: 11 July 2005


(Signature of Plaintiff)



